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REMARKS

Claims 1-20, 22-26 and 30 are currently pending in the subject application and are presently under consideration. Claims 1, 6, 16, 2, 26 and 30 have been amended as shown at pages 2-8 of the Reply. Withdrawal of the finality of the Office Action is respectfully requested in view of new art being cited as a basis for rejecting the claims. At a minimum, applicants' representative requests entry and consideration of the herein amendments in view of the newly cited art.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

**I. Rejection of Claims 1, 13, 16, 18 and 30 Under 35 U.S.C. §102(b)**

Claims 1, 13, 16, 18 and 30 stand rejected under 35 U.S.C. §102(b) as being anticipated by Wu *et al.* (US Patent 5,774,551). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Scott does not teach each and every element of applicants' invention as recited in the subject claims.

A single prior art reference anticipates a patent claim only if it expressly or inherently describes each and every limitation set forth in the patent claim. *Trintec Industries, Inc., v. Top-U.S.A. Corp.*, 295 F.3d 1292, 63 U.S.P.Q.2D 1597 (Fed. Cir. 2002); *See Verdegaaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the ... claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

The subject invention relates to responding to challenges from various authentication systems that does not require recompiling and recoding of an application making the access request in an environment where the authentication systems are changing. For instance, applicants' claimed invention can receive an authentication challenge and send first data to an authentication manager that contains the challenge data minus any communication protocol data. This allows for an authentication manager that is generic for various communication protocols. The authentication manager can process the first data into one or more second data and pass the second data to one or more authentication modules. The ability for the authentication manager to

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produce multiple types of second data allows for the authentication manager to interact with various authentication modules that require differing input data. The second data can be specific to the needs of the authentication module that the second data is being sent to, such as by adding to, transforming, or removing some of the first data. In the case where the authentication module needs to interact with multiple authentication modules for a challenge, the authentication manager can process the first data into second data for one authentication module and different second data for another authentication module. Furthermore, the system can anticipate a challenge that will be received based upon a resource by an application and generate one or more potential responses prior to receiving the authentication challenge, thereby reducing the amount of time required to respond. In particular, independent claim 1 (and similarly independent claims 16 and 30) recites *a machine learning component that determines anticipated authentication challenges to resource requests from applications based upon run-time learning during previous resource requests by applications.*

Wu *et al.* does not teach or suggest the aforementioned claimed features of applicants' invention. The cited reference teaches a system for unified login authentication for users of a computer system employing multiple authentication services. The system can take a single set of login data and provide that data to one or more authentication modules in an appropriate form for each authentication module. However, the data provided to the authentication modules is based upon pre-determined mapping and encryption/decryption. Wu *et al.* does not provide a learning component that anticipates authentication challenges and produces responses in advance of a challenge. In fact, Wu *et al.* is silent regarding machine learning. Therefore, Wu *et al.* fails to teach or suggest a machine learning component that determines anticipated authentication challenges to resource requests from applications based upon run-time learning during previous resource requests by applications.

In view of the foregoing, applicants' representative respectfully submits that Wu *et al.* fails to teach or suggest all limitations of applicants' invention as recited in independent claims 1, 16, and 30 (and claims 13 and 18 that depend there from), and thus fails to anticipate the subject claimed invention. Accordingly, this rejection should be withdrawn.

## **II. Rejection of Claims 2-7, 17, 22, 23 and 26 Under 35 U.S.C. §103(a)**

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Claims 2-7, 17, 22, 23 and 26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Wu *et al.* (US Patent 5,774,551) in view of Van Hoff (US Patent 5,822,539) and Travis *et al.* (US Patent 6,269,367). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Wu *et al.*, Van Hoff, and Travis *et al.*, alone or in combination, do not teach or suggest each and every limitation of applicants' claimed invention.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicants' disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Independent claims 22 and 26 recites similar limitations to independent claims 1, 16 and 30, and claims 2-7, 17 and 23 depend from independent claims 1, 16 and 22. As noted *supra*, Wu *et al.* does not teach or suggest each and every element of the subject invention as recited in these independent claims and Van Hoff, and Travis *et al.* fail to make of for the deficiencies of Wu *et al.* with regard to these independent claims. Van Hoff discloses a document annotation system that annotates a document with hyperlinks to a set of user specified cross reference material. Van Hoff is silent regarding machine learning and authentication. Travis *et al.* teaches a system for identifying code fragments in a program and correcting the code fragments. The cited art is also silent regarding machine learning and resource request authentication. Moreover, as Van Hoff, and Travis *et al.* are unrelated to resource request authentication, there is no motivation to combine them with Wu *et al.* However, both of the cited art are silent regarding machine learning and even if combined with Wu *et al.* do not teach or suggest a machine learning component that determines anticipated authentication challenges to resource requests from applications based upon run-time learning during previous resource requests by applications.

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Accordingly, applicants' representative respectfully submits that Wu *et al.*, Van Hoff, and Travis *et al.*, alone or in combination, fail to teach or suggest all limitations of applicants' invention as recited in independent claims 22 and 26, and dependent claims 2-7, 17 and 23, and thus fails to make obvious the subject claimed invention. Therefore, this rejection should be withdrawn.

**III. Rejection of Claims 8-12, 14, 15, 19, 20, 24 and 25 Under 35 U.S.C. §103(a)**

Claims 8-12, 14, 15, 19, 20, 24 and 25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Wu *et al.* (US Patent 5,774,551) in view of Van Hoff (US Patent 5,822,539) and Travis *et al.* (US Patent 6,269,367) and further in view of Object Oriented Programming as Illustrated by Burroughs *et al.* (US Patent 5,878,411), Kumar *et al.* (US Patent 6,343,287), Microsoft Press (Microsoft Press, "Computer Dictionary, 3<sup>rd</sup> edition, ISBN: 157231446X, 1997) and New Rider (New Rider, "Windows 98 Professional Reference", <http://cma.zdnet.com/book/win98prfref/ch15/ch15.htm>). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Wu *et al.*, Van Hoff, Travis *et al.*, Burroughs *et al.*, Kumar *et al.* and New Rider, alone or in combination, do not teach or suggest each and every limitation of applicants' claimed invention.

Claims 8-12, 14, 15, 19, 20, 24 and 25 depend from independent claims 1, 16 and 22. As noted *supra*, Wu *et al.*, Van Hoff, and Travis *et al.* does not teach or suggest each and every element of the subject invention as recited in these independent claims and Burroughs *et al.*, Kumar *et al.* and New Rider fails to make of for the deficiencies of Blankestejin with regard to these independent claims. Burroughs *et al.* discloses a system mapping an object between an object oriented schema and a relational data store scheme. Burroughs *et al.* is silent regarding machine learning and authentication. Kumar *et al.* teaches a system for creating connector class object to external data stores. The cited art is also silent regarding machine learning and resource request authentication. New Rider discloses client and server concepts including communication authentication. However, the cited art does not teach or suggest machine learning. Therefore, Wu *et al.*, Van Hoff, Travis *et al.*, Burroughs *et al.*, Kumar *et al.* and New Rider, alone or in combination, do not teach or suggest a machine learning component that determines anticipated authentication challenges to resource requests from applications based upon run-time learning during previous resource requests by applications.

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In view of the foregoing, applicants' representative respectfully submits that Wu *et al.*, Van Hoff, Travis *et al.*, Burroughs *et al.*, Kumar *et al.* and New Rider, alone or in combination, fail to teach or suggest all limitations of applicants' invention as recited in independent claims 1, 16 and 22 (and claims 8-12, 14, 15, 19, 20, 24 and 25 that depend therefrom), and thus fails to make obvious the subject claimed invention. Therefore, this rejection should be withdrawn.

#### CONCLUSION

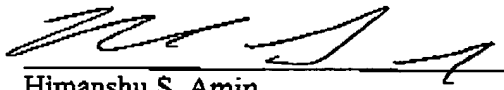
The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP202US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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